

RCRAInfo CM&E EVALUATION – VIOLATION FORM

*EPA ID Number		PAD982660961			EIN	
Handler Name		Bombardier Transportation				
Street	2001 Lebanon Road					
City	West Mifflin	State	PA	Zip Code	15122	
Actual Generator Status <i>Check only if different from Notified Status.</i>		LQG <input type="checkbox"/>	SQG <input checked="" type="checkbox"/>	CESQG <input type="checkbox"/>	Closed <input type="checkbox"/>	Non-Handler <input type="checkbox"/>
Universe Change Required? <i>(Generator Status Change Required)</i>		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Universe Change Section (on reverse side of this form).				
RCRA Non-Notifier?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).				
Other Facility Information Changes?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).				
*EVALUATION		<input type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete		You must provide an Evaluation Identifier (also known as the Sequence Number).		
*Evaluation Identifier	*Type	*Evaluation Start Date (mm/dd/yyyy)	*Agency	Responsible Person	Suborganization	
	CEI	4/19/2007	S	JWK	PA-DEP WM	
Day Zero (mm/dd/yyyy): <i>You need to specify Day Zero for all evaluation types except CDI, CSE, FUI, SNN, and SNN, otherwise it defaults to Evaluation Start Date. For CDI, CSE, FUI, and SNN evaluations, you must select a previous CEI Start Date for the Day Zero. SNN evaluation type does not require a Day Zero.</i>			4/19/2007	Reclassified SV Date: <i>Only applicable for SNN evaluation type as appropriate.</i>		
Notes:		NO VIOLATIONS NOTED				
Evaluation Indicator Field (Check all that apply)						
<input type="checkbox"/> Citizen Complaint <input type="checkbox"/> Multimedia Inspection <input type="checkbox"/> Sampling <input type="checkbox"/> Not Subtitle C						
Focused Coverage Areas (Use Only for Evaluation Type FCI)						
<i>Regulation-Specific FCI</i>						
BIF <input type="checkbox"/>	CCI <input type="checkbox"/>	CFI <input type="checkbox"/>	INC <input type="checkbox"/>	LDR <input type="checkbox"/>	PTB <input type="checkbox"/>	PTX <input type="checkbox"/>
THI <input type="checkbox"/>	UIC <input type="checkbox"/>	UOI <input type="checkbox"/>	UWR <input type="checkbox"/>	OTHER (specify): _____		
<i>Routine/Standardized FCI</i>						
CAR <input type="checkbox"/>	CPC <input type="checkbox"/>	DOS <input type="checkbox"/>	EMR <input type="checkbox"/>	IEI <input type="checkbox"/>	ISI <input type="checkbox"/>	RTI <input type="checkbox"/>
Does this Evaluation Add/Update/Delete a Violation?			YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		<i>If Yes, fill in the Violations Section(s) on page 2 of this form.</i>	
Does this Evaluation link to a Commitment?			YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		<i>If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.</i>	
Does this Evaluation link to a 3007 Request?			YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		<i>If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.</i>	
OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> <i>If Yes, fill in information below.</i>						
*Seq. No.	*Violation Type	*Agency	*Regulation Citation (Type + Citation) (ex. FR 262.1)		*Date Determined (mm/dd/yyyy)	

*Required Fields

EPA



HAZARDOUS WASTE INSPECTION REPORT

☐ GENERATOR☒ S Q GENERATORCompany name BOMBARDIER TRANSPORTATIONEPA I.D. Number PAD982660961 Employer I.D. Number (EIN) _____Site Address 2001 LEBANON ROAD, WEST MIFFLIN, PACounty ALLEGHENY Municipality WEST MIFFLIN Zip 15122Name of Inspector JOHN W. KENDALL, WASTE MGT. SPECIALISTName & Title of Responsible Official GAYLYN FROSINI, HEALTH, SAFETY & ENVIRONMENTAL SPECIALISTPerson Interviewed GAYLYN FROSINI Telephone (412) 650-6440Mailing Address (if different from above) 1501 LEBANON CHURCH ROAD, PGH., PA 15236

Amount of Hazardous Waste Generated per Month: _____ Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity HandlerUniversal Waste Types LAMPS, BATTERIES (RECYCLED)

3. Hazardous Waste Transporters:

Transporter Name SAFETY KLEEN (TXR000050930) License Number PA-AH 0469

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001 D035 F005	WASTE SOLIDS CONTAINING FLAMMABLE LIQUID, MEK & MINERAL SPIRIT	KYD053348108
D001 D035	WASTE PAINT RELATED MATERIAL	KYD053348108



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name BOMBARDIER TRANSPORTATIONID Number PAD982660961Date 04/19/2007

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
	X			Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
X				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
X				SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
	X			Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
	X			Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
	X			Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.43	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
	X			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
	X			Source reduction strategy prepared and available (LQG only)	262a.100		H020
	X			Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name BOMBARDIER TRANSPORTATIONID Number PAD982660961Date 04/19/2007

1 - No Violation Observed 2 - Not Applicable

3 - Not Determined

4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
		X		Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection: 19 APRIL 2007 Identification Number: PAD982660961

Company/Facility/Site Name: BOMBARDIER TRANSPORTATION

A RCRA Compliance Evaluation Inspection was conducted at the above-mentioned facility. The purpose of this inspection was to evaluate the facilities Hazardous Waste management activities. Accompanying me was Gaylyn Frosini, the facilities Health, Safety & Environmental Specialist.

This facility, located at 2001 Lebanon Road, West Mifflin, PA, 15122, manufactures propulsion and control equipment for heavy rail/metro lines and automated people mover systems. The RCRA Subtitle C Site Identification Form for SQG status for this facility was received 27 April 2005. The Department had never inspected the facility.

Hazardous Waste generated at this facility consists of waste from a paint booth operation and solvent parts cleaner, which is serviced by Safety Kleen. A satellite accumulation drum services this area. A hazardous waste storage area is maintained in a separate building located outside of the manufacturing area. There were no hazardous wastes in the (180 day) storage building at the time of this inspection. Also stored here were residual waste oils and greases.

A records review included manifests for Hazardous Waste disposal, HAZWOPER training certificates for June 2006, and the facilities Emergency Action. Fire Prevention, and Hazard Communication Plan, which had been revised 02/16/2007. This plan included Incident Response to Hazardous Chemical releases.

There were no violations noted at the time of this inspection.

violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analysis or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature): MAILED Date:

Inspector (signature): John W. Keshell Date: 19 April 2007

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RCRAInfo CM&E EVALUATION – VIOLATION FORM

*EPA ID Number		PAD982660904		EIN			
Handler Name		Bombardier Transportation					
Street		1501 Lebanon Church Road					
City		Pittsburgh		State	PA	Zip Code	15236
Actual Generator Status <i>Check only if different from Notified Status.</i>				LQG <input type="checkbox"/>	SQG <input checked="" type="checkbox"/>	CESQG <input type="checkbox"/>	Closed <input type="checkbox"/>
Universe Change Required? <i>(Generator Status Change Required)</i>				YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Universe Change Section (on reverse side of this form).			
RCRA Non-Notifier?				YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).			
Other Facility Information Changes?				YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).			

*EVALUATION		<input type="checkbox"/> Add	<input type="checkbox"/> Update	<input type="checkbox"/> Delete	You must provide an Evaluation Identifier (also known as the Sequence Number).		
*Evaluation Identifier	*Type	*Evaluation Start Date (mm/dd/yyyy)	*Agency	Responsible Person	Suborganization		
	CEI	4/19/2007	S	JWK	PA DEP WM		
Day Zero (mm/dd/yyyy): <i>You need to specify Day Zero for all evaluation types except CDI, CSE, FUI, SNN, and SNN, otherwise it defaults to Evaluation Start Date. For CDI, CSE, FUI, and SNN evaluations, you must select a previous CEI Start Date for the Day Zero. SNN evaluation type does not require a Day Zero.</i>				4/19/2007	Reclassified SV Date: <i>Only applicable for SNN evaluation type as appropriate.</i>		

Notes:

NO VIOLATIONS NOTED

Evaluation Indicator Field (Check all that apply)			
<input type="checkbox"/> Citizen Complaint	<input type="checkbox"/> Multimedia Inspection	<input type="checkbox"/> Sampling	<input type="checkbox"/> Not Subtitle C
Focused Coverage Areas (Use Only for Evaluation Type FCI)			
<i>Regulation-Specific FCI</i>			
BIF <input type="checkbox"/>	CCI <input type="checkbox"/>	CFI <input type="checkbox"/>	INC <input type="checkbox"/> LDR <input type="checkbox"/> PTB <input type="checkbox"/> PTX <input type="checkbox"/>
THI <input type="checkbox"/>	UIC <input type="checkbox"/>	UOI <input type="checkbox"/>	UWR <input type="checkbox"/> OTHER (specify): _____
<i>Routine/Standardized FCI</i>			
CAR <input type="checkbox"/>	CPC <input type="checkbox"/>	DOS <input type="checkbox"/>	EMR <input type="checkbox"/> IEI <input type="checkbox"/> ISI <input type="checkbox"/> RTI <input type="checkbox"/>

Does this Evaluation Add/Update/Delete a Violation?	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	<i>If Yes, fill in the Violations Section(s) on page 2 of this form.</i>
Does this Evaluation link to a Commitment?	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	<i>If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.</i>
Does this Evaluation link to a 3007 Request?	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	<i>If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.</i>
OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		<i>If Yes, fill in information below.</i>

*Seq. No.	*Violation Type	*Agency	*Regulation Citation (Type + Citation) (ex. FR 262.1)	*Date Determined (mm/dd/yyyy)

*Required Fields

EPA ✓

**HAZARDOUS WASTE INSPECTION REPORT****GENERATOR****S Q GENERATOR**Company name BOMBARDIER TRANSPORTATIONEPA I.D. Number PAD982660904

Employer I.D. Number (EIN) _____

Site Address 1501 LEBANON CHURCH ROAD, PGH., PACounty ALLEGHENYMunicipality WEST MIFFLINZip 15236Name of Inspector JOHN W. KENDALL, WASTE MGT. SPECIALISTName & Title of Responsible Official GAYLYN FROSINI, HEALTH, SAFETY & ENVIRONMENTAL SPECIALISTPerson Interviewed GAYLYN FROSINITelephone (412) 650-6440

Mailing Address (if different from above) _____

Amount of Hazardous Waste Generated per Month: 7200 2200 Pounds _____ Kgs _____**1. Site Characterization:**STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad**2. Universal Waste:** ☐ Large Quantity Handler ☒ Small Quantity HandlerUniversal Waste Types LAMPS, BATTERIES (RECYCLED)**3. Hazardous Waste Transporters:**Transporter Name SAFETY KLEEN (TXR000050930)License Number PA-AH 0469

Transporter Name _____

License Number _____

Transporter Name _____

License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001 D035 F005	WASTE SOLIDS CONTAINING FLAMMABLE LIQUIDS, MEK & MINERAL SPIRITS	KYD053348108
D001 D035	WASTE PAINT RELATED PRODUCTS	KYD053348108



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name BOMBARDIER TRANSPORTATIONID Number PAD982660904Date 04/19/2007

1 - No Violation Observed 2 - Not Applicable

3 - Not Determined

4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
	X			Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
X				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
X				SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
	X			Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
	X			Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
	X			Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.43	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
	X			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
	X			Source reduction strategy prepared and available (LQG only)	262a.100		H020
	X			Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name BOMBARDIER TRANSPORTATIONID Number PAD982660904Date 04/19/2007

1 - No Violation Observed 2 - Not Applicable

3 - Not Determined

4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
		X		Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection: 19 APRIL 2007 Identification Number: PAD982660904

Company/Facility/Site Name: BOMBARDIER TRANSPORTATION

A RCRA Compliance Evaluation Inspection was conducted at the above-mentioned facility. The purpose of this inspection was to evaluate the facilities Hazardous Waste management activities. Accompanying me was Gaylyn Frosini, the facilities Health, Safety & Environmental Specialist.

This facility, located at 1501 Lebanon Church Road, West Mifflin, PA, 15236, manufactures fully Automated People Movers (APM), fully automated rapid transit rubber tired technology, and fully automated advanced rapid transit systems. The RCRA Subtitle C Site Identification Form for SQG status for this facility was received 27 April 2005. The Department had never inspected the facility.

Hazardous Waste generated at this facility consists of waste from solvent parts cleaner, which is serviced by Safety Kleen. A satellite accumulation drum services the manufacturing area. A hazardous waste storage area is maintained in a separate building located outside of the manufacturing area. The Hazardous Waste (180 day) storage area contained one drum of Hazardous Waste Solids, which had an accumulation start date of 17 April 2007. A second drum of Hazardous Waste Liquids was dated 10/19/2006 and was due for disposal. A call will be made to have it removed immediately. A drum of residual waste liquid was no labeled, but was corrected immediately.

A records review included manifests for Hazardous Waste disposal, HAZWOPER training certificates for June 2006, and the facilities Emergency Action. Fire Prevention, and Hazard Communication Plan, which had been revised 02/16/2007. This plan included Incident Response to Hazardous Chemical releases.

There were no violations noted at the time of this inspection.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analysis or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature): MAILED Date:

Inspector (signature): John W. Rendell Date: 19 April 2007

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